

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

JOHN DOES 1-44,

Defendants *in rem*.

No. 3:16-CV-1025-L

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNМ.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNY.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

In rem Defendants respectfully request a one-week extension of time for Defendants to answer, move, or otherwise respond to Plaintiff Associated Recover's August 1, 2016 Amended Complaint (Dkt. 76). Under Rule 15(a)(3), Defendants must respond to the Amended Complaint by Monday, August 15th. The requested one-week extension will allow Defendants to further

prepare their forthcoming Rule 12(b) motion to dismiss including declarations, if needed, from Defendants' respective owners, most of whom are Chinese.

This one-week extension is not sought for purposes of delay. The Court has not yet set a schedule in this Action, so there is no impact on any future court dates. Nor would the extension prejudice Plaintiff. Plaintiff does not oppose this Motion.

Accordingly, Defendants respectfully request an extension up to and including August 22, 2016 for Defendants to answer, move, or otherwise respond to the Amended Complaint. A proposed Order granting this unopposed Motion is provided herewith.

Dated: August 12, 2016

Respectfully submitted

By: /s/ Steven M. Geiszler

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Counsel for Defendants

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on August 11, 2016, I corresponded with Plaintiff's counsel by email concerning the foregoing motion. Plaintiff's counsel stated Plaintiff does not oppose.

/s/ Steven M. Geiszler

Steven M. Geiszler

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 12, 2016 I caused the foregoing document to be served on counsel of record via the Court's CM/ECF system.

/s/ Steven M. Geiszler

Steven M. Geiszler

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